



NASFAA 2004

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Helping Students Make it After All!





Return of Title IV Aid

Brian Kerrigan

Dan Klock



Today's Agenda

- **Dear Colleague Letter GEN-04-03 – Brian Kerrigan**
- **R2T4 On the Web – Dan Klock**
- **Questions and Answers - both**
- **Appendix – helpful reminders that you can read on your own**



The Law & Regulations

- Section 484B of the HEA
 - Enacted October 7, 1998, as part of the Higher Education Amendments of 1998
- NPRM published August 6, 1999
- Final Reg published November 1, 1999
 - Effective Date of Reg - July 1, 2000
- Dear Colleague Letter GEN-00-24
- NPRM published August 8, 2002
- Final Reg published November 1, 2002
- Dear Colleague Letter GEN-04-03



New Approach

- **Old approach – (refunds and repayments)**
- Dictated use of specific refund policies.
- Determined amount of institutional charges that a school had earned and not earned.
- **New approach – (Return to Title IV Funds)**
- Determines amount of title IV aid a student has earned, the unearned portion is returned
- “Paycheck theory” – if you aren’t there for the entire period you owe some of the money back



Dear Colleague Letter (DCL) (GEN-04-03)

- **Title IV Credit Balances**
- **Aid That Could Have Been Disbursed**
- **Verification not completed before withdrawal**
- **No Passing Grades**
- **Non-Term Programs**
- **Date of Determination that Student Withdrew**
- **Treatment of LEAP Funds**



DCL (GEN-04-03)

Title IV Credit Balances

- **Hold all Title IV Credit Balances until R2T4.**
- **Credit Balance is “Aid Disbursed.”**
- **Determine if Credit Balance changes because of a Refund Policy or R2T4.**
- **Use Credit Balance to repay TIV Grant Overpayment on behalf of student.**
- **Release Credit Balance within 14 days.**



DCL (GEN-04-03)

Aid That Could Have Been Disbursed

- **Old Policy -- Aid must have been able to have been disbursed during period. Did not include**
 - **Second loan disbursement, or**
 - **Loan within first 30 days.**

- **New Policy -- All aid for period, if conditions for late disbursement were met before the student withdrew. (668.164(g)(2))**

- **However, if limitations apply, that aid may not be paid to the student. (668.164(g)(4))**



Conditions for a Late Disbursement

- **All Student Aid (including Pell) - ED processed SAR/ISIR with official (not necessarily a valid) EFC. (Not needed for PLUS.)**
- **FFEL/Direct Loan - Institution certified or originated the loan.**
- **Perkins/FSEOG - Institution made the award.**



Limitations on Making a Late Disbursement

- **No second or subsequent disbursements of FFEL/DL, unless student completes the period.**
- **No FFEL/DL unless student completes the 30-day delay period.**
- **No Pell Grant without a valid SAR/ISIR by the deadlines in the Federal Register.**
- **No additional Pell Grant if first payment period is not completed.**



Importance of Aid That Could Have Been Disbursed

- **If total aid (Aid That Could Have Been Disbursed plus Aid Disbursed) is greater, the amount earned will be greater.**
- **Results in a smaller amount to be returned, or in a post-withdrawal disbursement.**
- **Remember - Aid must correspond to the period for which you are doing the Return Calculation. (Apples to Apples)**



Aid That Could Have Been Disbursed

Old Rule – Period of Enrollment Basis

Length of Period = 1000 hours

Aid for Period = \$4,000 (\$2,000 Pell; \$2,000 FFEL)

Disbursed = \$2,000 (\$1,000 Pell; \$1,000 FFEL)

Student Withdrew after 400 hours

Not Disbursed = \$2,000

Aid That Could Have Been Disbursed = \$0

Student Completed 40% of period

Amount Earned = \$800 (40% x \$2,000*)

Amount to be Returned = \$1,200



Aid That Could Have Been Disbursed

New Rule – Period of Enrollment Basis

Length of Period = 1000 hours

Aid for Period = \$4,000 (\$2,000 Pell; \$2,000 FFEL)

Disbursed = \$2,000 (\$1,000 Pell; \$1,000 FFEL)

Student Withdrew after 400 hours

Not Disbursed = \$2,000

Aid That Could Have Been Disbursed = \$2,000

Student Completed 40% of period

Amount Earned = \$1,600 (40% x \$4,000*)

Amount to be Returned = \$400



Aid That Could Have Been Disbursed

New Rule – Period of Enrollment Basis

Length of Period = 1000 hours

Aid for Period = \$4,000 (\$2,000 Pell; \$2,000 FFEL)

Disbursed = \$1,000 (\$1,000 Pell; \$0 FFEL)

Student Withdrew after 400 hours

Not Disbursed = \$3,000

Aid That Could Have Been Disbursed = \$3,000

Student Completed 40% of period

Amount Earned = \$1,600 (40% x \$4,000*)

Amount of PWD = \$600 (FFEL)



Aid That Could Have Been Disbursed

New Rule – Period of Enrollment Basis

Length of Period = 1000 hours

Aid for Period = \$4,000 (\$2,000 Pell; \$2,000 FFEL)

Disbursed = \$1,000 (\$0 Pell; \$1,000 FFEL)

Student Withdrew after 400 hours

Not Disbursed = \$3,000

Aid That Could Have Been Disbursed = \$3,000

Student Completed 40% of period

Amount Earned = \$1,600 (40% x \$4,000*)

Amount of PWD = \$600 (Pell)



Aid That Could Have Been Disbursed

New Rule – Period of Enrollment Basis

Length of Period = 1000 hours

Aid for Period = \$4,000 (\$2,000 Pell; \$2,000 FFEL)

Disbursed = \$3,000 (\$2,000 Pell; \$1,000 FFEL)

Student Withdrew after 601 hours

Not Disbursed = \$1,000

Aid That Could Have Been Disbursed = \$1,000

Student Completed >60% of period

Amount Earned = \$4,000 (100% x \$4,000*)

Amount of PWD = Instead of \$1,000*; its \$0



Aid That Could Have Been Disbursed (Example A)

- **First time, first year student starts class on Sept. 1st and withdraws on Sept. 28th and Stafford loan for \$1,000 that has been certified/originated has not been disbursed because of the 30-day delay rule.**
 - **Include the \$1,000 loan as funds that “Could Have Been Disbursed.”**
 - **BUT, these funds cannot be disbursed because the student was not eligible due to the fact that the first time, first year student has not been in attendance for at least 30 days.**



Aid That Could Have Been Disbursed (Example B)

- **Second year student starts class on Sept.1st and withdraws on Sept. 28th and Stafford loan for \$1,000 that has been certified/originated has not been disbursed because of a processing delay or school choice.**
 - **Include the \$1,000 loan as funds that “Could Have Been Disbursed.”**
 - **A portion of these funds could be disbursed under a post-withdrawal disbursement because the student is not covered by the 30-day delay rule.**



Aid That Could Have Been Disbursed (Example C)

- **Student in a 900 clock hour program that uses period of enrollment for R2T4 withdraws after completing only 300 clock hours. First \$1,312 of loan has been disbursed.**
 - **Include the \$1,312 that has been disbursed AND the remaining \$1,313 as “Aid That Could Have Been Disbursed.”**
 - **BUT, no additional loan funds can be disbursed because subsequent loan disbursements cannot be made for students who do not complete the period.**



Aid That Could Have Been Disbursed (Example D)

- Student in a 900 clock hour program that uses payment period for R2T4 withdraws after completing only 300 clock hours. First \$1,312 of loan has been disbursed.
 - Include the \$1,312 that has been disbursed, BUT do not include the remaining \$1,313 as “funds that could have been disbursed” since those funds were for a different period.



DCL (GEN-04-03)

Verification

- **Must complete R2T4 within 30 days.**
- **If Verification not completed**
 - **Return Interim Disbursements of aid subject to verification.**
 - **Include Unsubsidized and PLUS loans in R2T4.**
- **If Verification completed later, but within Verification timelines**
 - **School must perform new R2T4 calculation using additional eligible aid.**



DCL (GEN-04-03)

No Passing Grades

- **School must have a process for determining if student completed.**
- **At least one passing grade...**
- **No passing grade, institution must document completion of period.**
- **Grading Policy that differentiates between Failing, Completed; and Failing, Did Not Complete.**



DCL (GEN-04-03)

Non-Term, Credit Hour Programs

- **Percentage Earned is equal to calendar days completed divided by calendar days in the period.**
- **Project calendar days in period if student is in a Self-Paced Program.**
- **Will be the same for a term-based, credit hour program.**



DCL (GEN-04-03)

Date of Determination that Student Withdrew for Schools Required to Take Attendance

- Usually no later than one week after last date of attendance.
- Based on Attendance Records.
- Date of Official Notification if prior to that.
- After end of school's Absence Policy.



DCL (GEN-04-03)

Treatment of LEAP Funds

- **Law excludes FWS but not LEAP.**
- **The State Grant (LEAP) is included in calculation if the State Grant Agency has told the school, in writing...**



DCL (GEN-04-03)

Treatment of LEAP Funds

The dollar or percent of student's State Grant that is LEAP. (\$ or % up to \$5,000)

That the specific student's State Grant includes an unknown amount of LEAP. (Entire amount of Grant, up to \$5,000)

The percent of LEAP in the school's State Grant amount. (% up to \$5,000)

That all State Grants include LEAP funds. (Entire amount of Grant, up to \$5,000)



Return to Title IV On the Web

R2T4OTW



Overview

- **Benefits**

- **No software installation necessary**
- **Ability to counsel students from any office on campus**
- **No need for redistribution of software if change to calculation**
- **Easy to Use!**
 - **Like functionality**



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FAQs



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Welcome to Return of Title IV Funds on the Web (R2T4)

Return of Title IV Funds (R2T4) is non-year specific software that processes, calculates, manages and stores the return of Title IV aid calculation record. The following links are available for your information.

Before You Start

Overview

What is R2T4?

Gather the following:

- [Student's Withdrawal Information](#)
- [Student's Title IV Aid Information](#)
- [Student's Program Information](#)
- [Student's Account Information](#)
- [School Information](#)

Using R2T4

Setup the School screens:

- [Institutional Charges](#)
- [School Calendar](#)
- [User-Specified Fields](#)

Student records:

- [Create a new student](#)
- [Find an existing student](#)

Follow Up

Overpayment Notification and Tracking reports:

- [Students Notified](#)
- [School Portion of R2T4 to be Returned](#)
- [Student Repayment Arrangement\(s\) - Completed](#)
- [Student Repayment Arrangement\(s\) - Not Completed](#)
- [Notification Tracking Status](#)
- [Students With a Post-Withdrawal Disbursement - Not Completed](#)
- [Student Listing](#)
- [Student Records To Be Referred to the Department of Education](#)





Application

- **Navigation Bar (8 Options)**
 - **Student Record Status**
 - Select to view status of student record(s)
 - **Create New Record**
 - Select to create a new student record
 - **Find Existing Record**
 - Select to update/view an existing student record
 - **Institutional Charges**
 - Select to define the institutional charges profile(s)
 - Note: Need at least 1 defined per award year



Application

- **Navigation Bar (cont)**
 - **School Calendar**
 - **Select to define the school calendar profile(s)**
 - **Note: At least 1 institutional profile must be defined prior to creating for any award year**
 - **User-Specified Fields**
 - **Select to define up to 10 School User-Specified fields**
 - **Note: 5 fields will be available that are already defined**
 - **Reports**
 - **Select to view one of 6 reports**
 - **Data Export**
 - **Select to export/browse student data**



Tip #1

- **Setup one Institutional Charge Code per Award Year**
 - Use '\$0' or most common charge amounts
 - Modify at the record level the individual charges that vary

Institutional Charges Update - FAA Access to CPS Online - U.S. Department of Education - Microsoft Internet Explorer provided b

File Edit View Favorites Tools Help

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Address <https://test.fotw.sfa.ed.gov:8445/FOTWWebApp/R2T4Servlet;sessionId=000wFRXFI9LbGMoEagZjdJm-1> Go

Links Customize Links Free Hotmail Windows Media Windows Free AOL & Unlimited Internet

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Update Institutional Charges Information

Award Year: 2004

Institutional Charges Code: SCP04

Program Title: School Cal 2004

Program Type:

Description	Amount
Tuition and Fees:	\$
Room:	\$
Board:	\$
	\$
	\$
	\$
	\$
	\$
	\$

Internet



Tip #2

- **When searching and/or creating School Calendar Profiles, make sure you enter the correct Award Year.**

Search for School Calendar Profile - FAA Access to CPS Online - U.S. Department of Education - Microsoft Internet Explorer prov

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Search for School Calendar Profile

You can search for school calendar profiles by providing information in the following search criteria. If you do not have the information for a field, leave it blank. Select **Search** to continue.

Award Year:

School Calendar Profile Code:

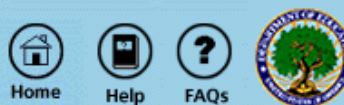
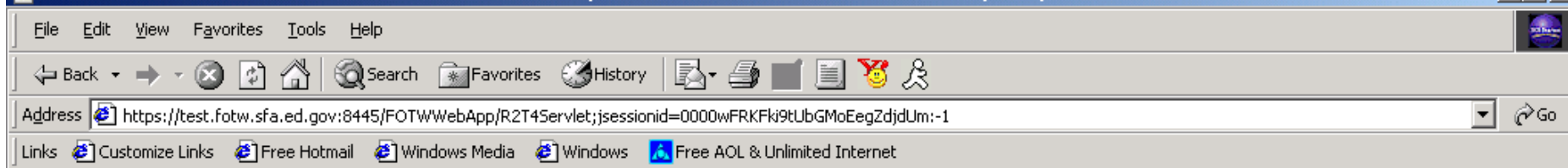
Keywords in School Calendar Profile Title:

If you want to add a school calendar profile, select **Add** to continue.

? Need help with this page? **Search** **Add**

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Done Internet



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School Calendar Profile Information

School Information

Award Year	2004
School Calendar Profile Code	SCP04
School Calendar Profile Title	SCHOOL CAL 2004
Institutional Charges Code	SCP04
Program Type	Credit Hour-Standard
Calculations of R2T4 based on	Payment Period
Payment Period* Start Date	09/01/2004
Payment Period* End Date	12/31/2004
Number of Days in the Payment Period	122
Number of Allowable Break Days	0
Net Days in the Payment Period	122
Mod. User	545-01-0001
Mod. Date	03/11/2004

**Or Period of Enrollment depending on Calendar Period*



Application

- **Creating New Record/Find Existing Record**
 - **Tab(s) Available:**
 - **Overview**
 - **Demographic Data**
 - **R2T4 Record(s)**
 - **Post-Withdrawal Record**
 - **Notes**
 - **User Data**

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Enter Social Security Number

Please enter the Social Security Number of the record you want to create.

Social Security Number:

Need help with this page?

Submit**Cancel****FSA SCHOOL PORTAL****RETURN TO FAA MENU****EXIT**

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Student Information

Last Name:

First Name:

Middle Initial:

Social Security Number:

444-44-4444

Date of Birth:

Please enter this date in "mmddyyyy" format. For example, 08171975

Driver's License Number:

Driver's License State:

School Cross Reference:

Student ID:

Permanent Address

Address:

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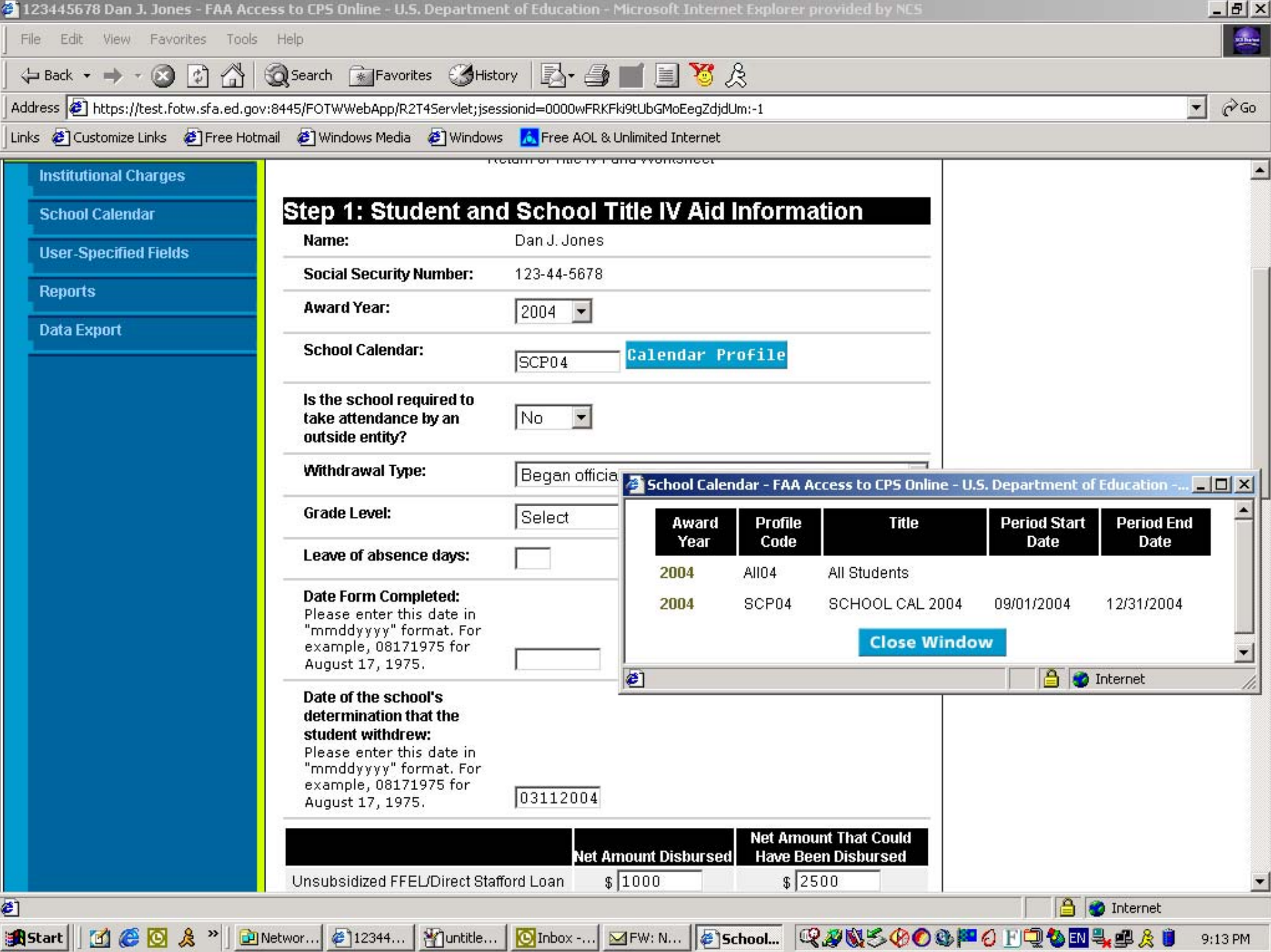
R2T4

Return of Title IV Fund Worksheet
Record 1 of 1

Printing this page requires that you have Adobe Acrobat software installed on your computer. Select this link if you do not have [Adobe Acrobat Reader](#) and would like to find out how to obtain it.

Step 1: Student and School Title IV Aid Information

Name:	Dan J. Jones
Social Security Number:	123-44-5678
Award Year:	2004
School Calendar:	SCP04
Is the school required to take attendance by an outside entity?	No
Withdrawal Type:	Began official withdrawal process
Grade Level:	
Leave of absence days:	
Date Form Completed:	
Date of the school's determination that the student withdrew:	03/11/2004
Print used for calculations:	Document Period



Step 1: Student and School Title IV Aid Information

Name: Dan J. Jones

Social Security Number: 123-44-5678

Award Year: 2004

School Calendar: SCP04 [Calendar Profile](#)

Is the school required to take attendance by an outside entity? No

Withdrawal Type: Began official

Grade Level: Select

Leave of absence days:

Date Form Completed:
Please enter this date in "mmddyyyy" format. For example, 08171975 for August 17, 1975.

Date of the school's determination that the student withdrew:
Please enter this date in "mmddyyyy" format. For example, 08171975 for August 17, 1975.

Award Year	Profile Code	Title	Period Start Date	Period End Date
2004	All04	All Students		
2004	SCP04	SCHOOL CAL 2004	09/01/2004	12/31/2004

[Close Window](#)

	Net Amount Disbursed	Net Amount That Could Have Been Disbursed
Unsubsidized FFEL/Direct Stafford Loan	\$ 1000	\$ 2500

August 17, 1975. 103112004

	Net Amount Disbursed	Net Amount That Could Have Been Disbursed
Unsubsidized FFEL/Direct Stafford Loan	\$ 1000	\$ 2500
Subsidized FFEL/Direct Stafford Loan	\$	\$
Perkins Loan	\$	\$
FFEL/Direct PLUS	\$	\$

	Amount Disbursed	Amount That Could Have Been Disbursed
Pell Grant	\$ 3050	\$
FSEOG	\$ 400	\$
Other Title IV programs	\$ 1000	\$ 0
Add Programs		

A. Total Title IV Aid Disbursed: \$ 5450
This is a display of the entered value

B. Total of Title IV Aid Disbursed plus the Title IV Aid that could have been disbursed: \$ 7950
This is a display of the entered value

Other Title IV Programs - FAA Access to CPS Online - U.S. Department of Education - Microsoft Internet Explorer

	Disbursed
LEAP	\$ 1000
	\$
	\$

Step 2: Percentage of Title IV Aid Earned

Withdrawal Date:

Please enter this date in "mmddyyyy" format. For example, 08171975 for August 17, 1975. (credit hour only)

10052004

Clock hours completed: (clock hour only)



Tip #3

- For a quick ‘summary’ report of Steps 6 & 8 (school and student return information) click on **Print** under the **Print Summary** column on the ‘Overview’ tab

123445678 Dan J. Jones - FAA Access to CPS Online - U.S. Department of Education - Microsoft Internet Explorer provided by NCS

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Student Information

Name: Dan J. Jones
Social Security Number: 123-44-5678
Student ID:

Records

Select the record award year to view the R2T4 record, or select print to view the summary report.

R2T4 Award Year	R2T4 School Calendar	R2T4 Last Modified	Post-Withdrawal Last Modified	Notes Last Modified	User Data Last Modified	Print Summary
2004	SCP04	01/30/2004				Print

Need help with this page? [Add R2T4 Record](#) [New Search](#)

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Done

Start Internet

8:03 PM



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Notes for Dan J. Jones
Record 1 of 1

Notes				
Notes	Mod. User	Mod. Date	Mod. Time	Edit

Dan came into the Registrars Office on 10/05/2004 to declare official withdrawal. Registrar sent the paperwork to to the Financial Aid Office on 10/5/2004.

Add Note

? Need help with this page?

View Printable Page



Application

- **User-Specified Fields**
 - **5 pre-defined fields**
 - **GPA**
 - **Major**
 - **Overpayment Status**
 - **Withdrawal Reason**
 - **Leave of Absence Reason**

Note: Schools can define up to 10 more in User-Specified Fields Setup



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User-Specified Fields

A maximum of 10 user-specified fields can be added.

User-Specified Fields				
Field	Type	Length	Description	Action
1	Date	8	Initial Discussion Date	Delete
2	Select	<input type="text"/>	<input type="text"/>	Add
	<div> Select Yes/No Numeric String Date </div>			



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User Data for Dan J. Jones
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User Data	
Item	Value
GPA	
Major	
Overpayment Status	
Withdrawal Reason	
Leave of Absence Reason	
Initial Discussion Date	



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Post-Withdrawal Worksheet for Dan J. Jones

Amount of Post-Withdrawal Disbursement

L. Amount from Box E of "Treatment of Title IV Funds" Worksheet:

Post-Withdrawal Disbursement Credited to Student's Account

M. Total outstanding charges on student's account: \$

N. Total amount of Post-Withdrawal disbursement credited to student's account

Amount of Post-Withdrawal disbursement credited for tuition, fees, room, and board (if student contracts with the school for Room and Board):

\$

Amount of Post-Withdrawal disbursement credited for other current charges:

\$

Amount of Post-Withdrawal disbursement credited for minor prior year charges (see help text):

\$

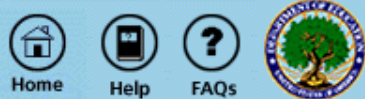
Total amount credited to Account:

\$



Application

- **Reports (6)**
 - **Student Listing**
 - **Student Notification**
 - **Student Repayment Arrangements**
 - **School Portion of R2T4 Returned**
 - **Students With a Post-Withdrawal Disbursements Not Completed**
 - **Student Records to be Referred to the Department of Education**



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Reports

The following reports are available for viewing


- [Student Listing](#)
- [Student Notification](#)
- [Student Repayment Arrangements](#)
- [School Portion of R2T4 Returned](#)
- [Students With a Post-Withdrawal Disbursement Not Completed](#)
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Student Listing Options

Withdrawal Start Date:
Please enter this date in "mmddyyyy" format. For example, 08171975

Withdrawal End Date:
Please enter this date in "mmddyyyy" format. For example, 08171975

Withdrawal Type: Select

Sort By: Select

? Need help with this page?

Submit Cancel

[Print This Page](#) [Print Help](#) [Close Window](#)

Report Date: 03/11/2004 U.S. DEPARTMENT OF EDUCATION PAGE: 1

Report Time: 22:30:12 RETURN OF TITLE IV FUNDS

Student Listing

THIS DOCUMENT CONTAINS SENSITIVE INFORMATION PROTECTED BY THE PRIVACY ACT

Social Security Number	Name	School Calendar Profile	Award Year	Withdrawal Type	Withdrawal Date
123-44-5678	Jones, Dan J.	SCP04	2004	Began official withdrawal process	03/11/2004

[Close Window](#)

Done

Internet

 Need help with this page?

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[Cancel](#)

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Start

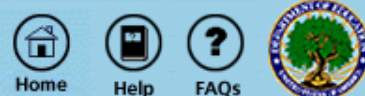
Network and Di...

Student Listing ...

post-withdrawa...

Student Listin...

9:30 PM



Return of Title IV Funds

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Notification Tracking Status

Welcome to Return of Title IV Funds On The Web! Here is the current status of your outstanding records.

Status Information

Number of students waiting to be notified:	2	View
Number of students who have been notified but have not made arrangements to repay:	0	View
Number of students who have been notified and have made arrangements to repay:	0	View
Number of students for whom the school has not returned funds:	2	View
Number of students for whom the school has returned funds:	0	View
Number of students with a Post-Withdrawal Disbursement not completed :	0	View
Number of student records to be referred to the Department of Education:	0	View





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School Portion of Title IV Funds To Be Returned

School must return the unearned portion of Title IV funds as soon as possible but no later than 30 days after the school determined that the student withdrew.

Social Security Number	Student Last Name	Student First Name	School Calendar Profile	Award Year	Date School Determined the Student W/drew	Days Remaining (30)	Date School Returned Funds
111-22-3333	TESTER	JOE	SCP04	2004	01/01/2004	-32	<input type="text"/>
123-44-5678	Jones	Dan	SCP04	2004	01/30/2004	-3	<input type="text"/>

Submit Cancel

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School must notify student of Title IV grant overpayment within 30 days of the school's Date of Determination that the student withdrew.

Social Security Number	Student Last Name	Student First Name	School Calendar Profile	Award Year	Date School Determined Student W/drew	Date Student Notified	Selected
123-44-5678	Jones	Dan	SCP04	2004	01/30/2004	<input type="text"/>	<input checked="" type="checkbox"/>
111-22-3333	TESTER	JOE	SCP04	2004	01/01/2004	<input type="text"/>	<input checked="" type="checkbox"/>

Default Date: 02202004

Select All

Fill All Selected

Deselect All

Submit

Cancel



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Tip #4

- You can use 'Fill All Selected' to update a selected group of records with the default date

Students Notified - FAA Access to CPS Online - U.S. Department of Education - Microsoft Internet Explorer provided by NCS Pears

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Students Notified

School must notify student of Title IV grant overpayment within 30 days of the school's Date of Determination that the student withdrew.

Social Security Number	Student Last Name	Student First Name	School Calendar Profile	Award Year	Date School Determined Student Withdrew	Date Student Notified	Selected
123-44-5678	Jones	Dan	SCP04	2004	01/30/2004	02202004	<input checked="" type="checkbox"/>
111-22-3333	TESTER	JOE	SCP04	2004	01/01/2004	02202004	<input checked="" type="checkbox"/>

Default Date: 02202004

Select All Fill All Selected Deselect All

Submit Cancel Fill All Selected

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javascript:FillAll()

Start Internet 7:56 PM



Applications

- **Data Export**
 - **Comma Delimited**
 - **Browse**



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Data Export

You may download your user data with one of the following options:

- Comma-delimited text file
- Browse Data

File Download



You have chosen to download a file from this location.

R2T4-001847-20040303.txt from test.fotw.sfa.ed.gov

What would you like to do with this file?

- ☐ Open this file from its current location
- ☒ Save this file to disk

☒ Always ask before opening this type of file

OK

Cancel

More Info



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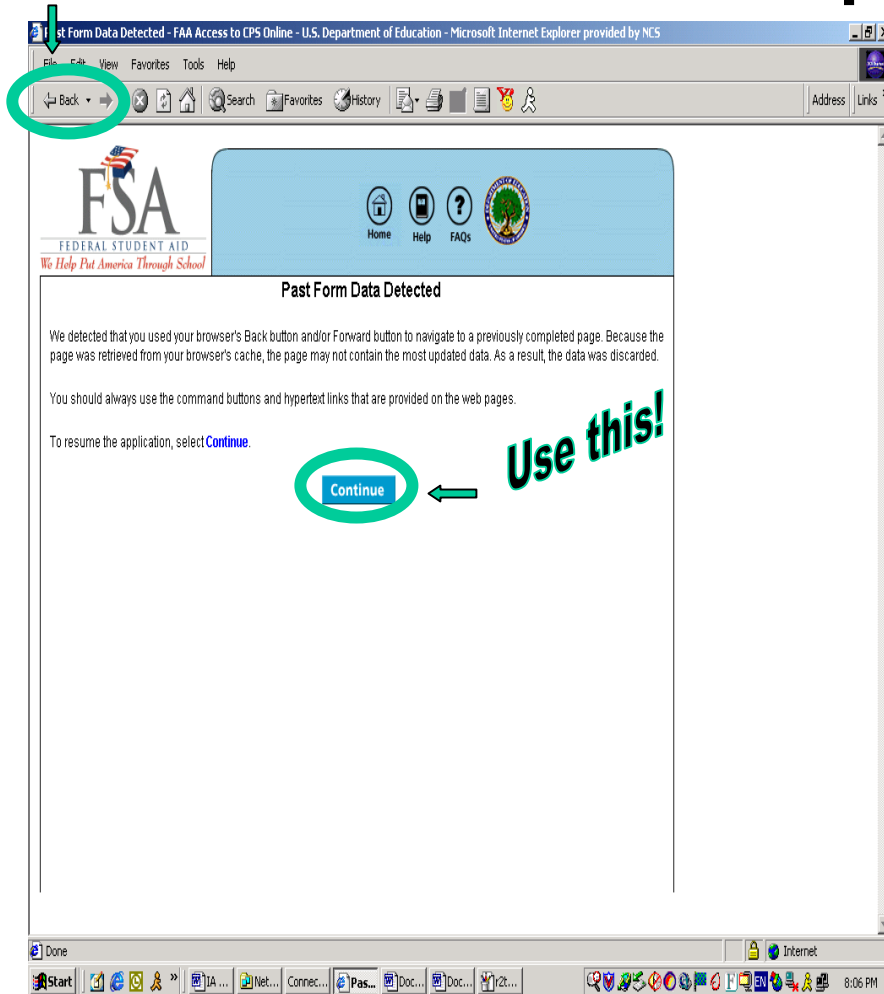
EXIT



Not this!

Tip #5

- **Use Command Buttons**
 - **Not 'Back'/'Forward'**





How do I access R2T4OTW?

- **It's Easy!**

- **SIGNUP!**

- Signup via SAIG Enrollment website

- » <https://www.fsawebenroll.ed.gov/PMEnroll>

Note: The R2T4 Web Application when available will be accessed via FAA Access

- » <https://fafsa.ed.gov/faa/faa.htm>

- **Expected Availability**

- September 2004



Customer Service

- **Software Support**
 - **CPS/WAN Technical Support**
cpswan@ncs.com
 - (800) 330-5947
- **Policy**
 - **ED's Customer Support center**
osfa_csb@ed.gov
 - (800) 433-7327



Thank You !!

Brian.Kerrigan@ed.gov

(202) 219 -7058

Dan.Klock@ed.gov

(202) 377- 4026



QUESTIONS???



APPENDIX

Reminders that you can read on
your own



The Return to Title IV Funds Rule

- **An institution is required to determine the earned and unearned portion of Title IV aid when a student ceases enrollment prior to the planned completion date**
 - **NOTE: Up through 60% of the Payment Period (PP) or Period of Enrollment (POE) an otherwise eligible student earns Title IV aid on a pro rata basis. After 60% student has earned 100% of TIV aid**
 - **ALSO: The Return calculation is suggested even if the student has earned 100%, to determine whether a post-withdrawal disbursement is required. If student withdraws after completing more than 60% and the calculation is not performed, the institution must document that the student attended more than 60%**



Earned Funds

- **If the amount of the Earned Title IV funds exceeds the amount that has been disbursed, the difference is due the student as a “Post-Withdrawal Disbursement” (PWD).**



Making a PWD/Late Disbursement

- Student Withdrew – (668.164(g)(3)(i))
 - Institution **MUST**
 - Make (offer) any PWD
 - If outstanding institutional charges may credit student's account for
 - Tuition and fees
 - Room & board (if contracted with the institution)
 - Authorized educationally-related expenses
- Less than ½ Time – (668.164(g)(3)(iii))
 - May disburse initial FFEL or DL disbursement
 - Inst. determines the amount of the late disbursement based upon educational costs for period student was eligible



Unearned Funds

- **Unearned Title IV funds that are the responsibility of the INSTITUTION**
 - **Must be returned to the Title IV programs no later than 30 days after the date of determination that the student withdrew.**



Unearned Funds – School's Responsibility

- Institution **MUST** return funds within 30 days of the date of determination
- Pell
 - 2002-2005
 - Phase-In schools – enter a negative disbursement
 - Full Participants – enter a replacement value
- Other Title IV funds – are returned to the program accounts or the lender



Cash Management – FYI (will be in the '04-05 Handbook)

- Schools prohibited from allowing Title IV funds to escheat (paid to a third party)
 - Credit balances and post-withdrawal disbursements
 - School must ensure that Title IV funds are used only for educational purposes intended
 - Funds cannot escheat to a third party (state or institutional coffers)
 - Must have a process to identify non-negotiated checks and return the funds to the Title IV programs before the checks are stale and escheat to an unintended third party



Unearned Funds – Student's Responsibility

- **Unearned Title IV funds that are the responsibility of the STUDENT**
 - **If loan funds, they can be repaid under terms of the promissory note.**
 - **If grant funds, they are subject to a 50% reduction and the student may make satisfactory arrangements to repay.**



Payment Period or Period of Enrollment

- **For a standard term based program, the institution must use the payment period.**
- **For a non-term or non-standard term program, the institution may use either the payment period or period of enrollment. Must use consistently for all students in a program.**



Approved Leave of Absence (LOA)

- **The previous limit to only one LOA in 12 months was eliminated in the November 1, 2002 final regulations.**
- **Total leave days cannot exceed 180 in any 12-month period.**
- **The institution must have a formal policy that the student and institution follow.**



The Institution Must

- **Determine date of student's withdrawal.**
- **Calculate percent of period completed.**
- **Determine amount earned by applying percent completed to total of amounts disbursed and amounts that could have been disbursed.**
- **Return unearned funds to Title IV programs, or pay student post-withdrawal disbursement.**
- **Determine Title IV overpayment, if any.**



Institutions Required to Take Attendance

- **Must use official attendance records.**
- **An institution is required to take attendance if an outside entity (such as an accreditor or state agency) has a requirement, as determined by the entity, that the institution take attendance.**
- **Could apply to a subset of students.**
- **Could apply for a short period of time.**



Required to Take Attendance

■ **Subset of Students**

- Outside agency provides a scholarship for 10 students
- Requires attendance taking for the cohort
- If one of these students withdraws, withdrawal date = last date of attendance

■ **Short Period of Time**

- State requires continuous attendance taking for 1st 10 days of class for resident students
- If a resident student withdraws within the first 10 days, withdrawal date = last date of attendance



Institutions Not Required to Take Attendance

- **Not Required to take attendance by an outside entity**
 - **Most institutions fit into this category.**
 - **Institutions or instructors that decide to take attendance may do so, but that does not make the institution “an institution required to take attendance” for R2T4 purposes.**



Institutions Not Required to Take Attendance

- **Withdrawal Date Is**
 - **Date student began the formal withdrawal process or notified...**
 - **Mid-point, if no notification.**
 - **Date of illness, accident, etc.**
 - **Beginning of an approved LOA if student does not return.**
 - **Last date at an academically-related activity.**



Academically-Related Activity

- **An institution not required to take attendance **MAY ALWAYS** use the last date of an academically-related activity as the withdrawal date.**
- **The school, not the student, must **DOCUMENT****
 - **That the activity is academically-related, and**
 - **The student's attendance at the activity.**



Academically-Related Activity

- **Examples of academically-related activities are**
 - **Examinations or quizzes,**
 - **Tutorials,**
 - **Computer-assisted instruction,**
 - **Completing an academic assignment, paper or project,**
 - **Attending a school assigned study group.**



Institutions Not Required to Take Attendance

- **Date of Determination of Withdrawal Is**
 - **Later of withdrawal date or date student provided official notification.**
 - **If no notification, the date that the institution became aware of the withdrawal.**
 - **The earlier of the end of approved Leave of Absence (LOA) if student does not return or the date the student contacted the school.**



Institutions Not Required to Take Attendance

- If the student withdraws **WITHOUT NOTIFICATION**, then the institution must make a determination of the withdrawal date
 - No later than 30 days after the earlier of
 - the end of the payment period or period of enrollment,
 - the end of the academic year, or
 - the end of the student's educational program.